

REMARKS

Claims 1, 2, 4-22 and 25-34 are pending in the application. Applicants thank the Examiner for the statement that Claims 1, 2 and 4-16 are allowable. The remaining Claims 17-22 and 25-34 are rejected. A number of rejections of the remaining claims are presented in the Office Action based on Sections 102(b) and 102(e). Claim 21 is rejected based on Section 103(a).

Applicants respectfully request reconsideration and withdrawal of the rejections in view of the following remarks.

1. The Claims Rejections Under 35 U.S.C. §102.

Claims 17, 21 and 31 have been amended to clarify the nature of the movement of at least one of the components of the apparatus for forming the recited junction point between individually conductive fibers or sections thereof. Claims 18 and 26 are amended to correct a lack of antecedent basis in the claims. Claim 19 is amended to delete an unnecessary term, and Claim 28 is amended to correct a typographical error therein.

a. The Rejection In View of Sutton (U.S. 2,049,575).

Claims 17, 20, 22, 25-29, 31, 33, and 34 stand rejected under 35 U.S.C. 102 (b) as anticipated by the Sutton '575 patent. Sutton discloses an apparatus for forming a seam for woven wire fabric and a method of making same. Sutton is not directed to identifying or forming a junction point between individually conductive fibers or sections of an individually conductive fiber in a fabric web. The device disclosed in Sutton for forming the seam is an electrically heated conduit 20 which is in a fixed position apart from the web preventing movement towards or away from the wire fabric web. While the conduit 20 is shown to be capable of movement (see, for example, Figs. 8-10), it is capable of movement in only one direction and is not capable of movement in at least two directions. Accordingly, Sutton fails to teach or suggest each and every element of the claims noted in the Office Action and, thus, fails to anticipate the claims.

b. The Rejection In View of Jayaraman, et al. (U.S. 6,381,482)

Claims 17-20, 22 and 25-34 stand rejected under 35 U.S.C. 102(b) as anticipated by the Jayaraman '482 patent. Jayaraman, however, also fails to disclose each and every element of the claims and, thus, fails to anticipate the claims. For example, Jayaraman fails to teach or suggest an apparatus that "has components disposed on opposite sides of the fabric web for bringing the conductive fibers or sections into contact with each other and forming the bond at the junction point, at least one of said components being designed for movement *across*

the fabric web to the junction point." While the Office Action in paragraph 12 comments that Jayaraman teaches an automatic process using moveable tools for removing insulating and applying paste, the Office Action fails to provide any citation to Jayaraman for such. Applicants respectfully submit that Jayaraman does not teach a tool that is designed for movement across the fabric web to a junction point. Should the Examiner disagree, Applicants respectfully request that the Examiner provide a citation to the line or lines in the Jayaraman '482 patent that the Examiner submits provides such a teaching.

c. The Rejection In View of Post (U.S. 6,493,933)

Claims 17-20, 22, 25, 26, 29, 31 and 34 stand rejected under 35 U.S.C. 102(b) as anticipated by the Post, et al. patent. Applicants respectfully submit that Post, like the Jayaraman '482 patent, fails to teach an apparatus that has components disposed on opposite sides of the fabric web for bringing the conductive fibers or sections into contact with each other and forming a bond at the junction point, at least one of said components being designed for movement across the fabric web to the desired junction point. Thus, the Post et al. '933 patent fails to anticipate the rejected claims.

The Office Action at paragraph 13 comments that Post teaches thermal compression bonding wherein a bonding tool is conventionally moved in multiple directions to form bonds. Applicants respectfully disagree with this description of Post. Typically thermal compression would involve motion towards and away from the wires to be bonded and not motion across a web. Should the Examiner disagree, Applicant respectfully the Examiner provide a citation to where Post teaches movement of a bonding tool across a web as opposed to towards and away from the web.

d. The Rejection Under Jung, et al. (U.S. 2004/0259391)

Claims 17-20, 22 and 25-34 stand rejected as anticipated by the Jung published application. Jung discloses a soldering device 20 that moves along the arrow direction illustrated in Fig. 2(a). The arrow direction illustrated is towards and away from the textile material. Applicants respectfully submit that Jung et al., like Post et al. and the Jayaraman '482 patent, fails to teach a device or apparatus that moves across the web to a desired junction point. Thus, Jung et al. fails to teach or suggest each and every feature of the claims and fails to anticipate the claims.

e. The Rejection Under Jayaraman, et al. (U.S. 6,687,523)

Claims 17 and 31-34 stand rejected under 35 U.S.C. 102(e) as anticipated by Jayaraman, et al. (the Jayaraman et al '523 patent). The Office Action comments that Jayaraman '523 teaches an automated apparatus and method for forming a junction between

conductors incorporated into a fabric. Applicants respectfully submit that this is an incorrect statement and that the Jayaraman '523 patent does not teach or disclose an automated apparatus. Jayaraman does teach an ultrasonic or laser means for removing insulation. However, there is no teaching as to how such means would be automated into the system recited in the claims. Further, while the Office Action comments that the joining device moves, the Office Action fails to provide a citation as to where there is any teaching in the Jayaraman '523 patent to movement of a joining device or apparatus across a fabric web as opposed to towards or away from the fabric web as recited in the claims. Accordingly, Applicants respectfully submit that the Jayaraman '523 patent fails to teach each and every feature of the claims and fails to anticipate the claims.

2. The Claim Rejections Under 35 U.S.C. 103

Claim 21 stands rejected under 35 U.S.C. 103(a) as being unpatentable based on the combination of either the Jayaraman '482 patent in view of Morey (U.S. 3,349,359) or alternatively, in view of the combination of Jung, et al. in view of Morey.

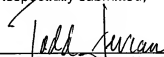
Morey discloses a system in which fixed stationary spray stations 26 spray a metal such as copper on the side edges of a fabric as the fabric moves underneath the spray stations. See, for example, Fig. 4. In Fig. 6, fixed spray stations 54 spray solder onto the side edges of a fabric while reservoir 56 and conduit means 58 spray flux material onto the same side edges for attaching conductive strips 60 to the side edges of the fabric. No track is taught or disclosed for these spray applications. Fig. 10 discloses pressurized spray gun 80 for lateral movement on track 82 for spraying heated plastic across the web. Accordingly, spray gun 80 does not serve to provide or create any form of electrical junction between conductive fibers or sections thereof within a fabric as recited in Claim 21.

As described above, neither Jayaraman, et al. '482 patent nor the Jung, et al. application teach an automated apparatus having a component for moving across the web for forming a junction between the conductive fibers or sections thereof. As described above Morey fails to provide such teaching. Accordingly, the combination of the references applied under these rejections fails to teach or disclose all of the features of Claim 21.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed and that all pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephone conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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